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Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR 16-00488 JST
)	
Plaintiff,)	
)	PARTIES' STIPULATED REQUEST TO
v.)	RESET STATUS HEARING
)	ON FEBRUARY 10, 2017
JOSE LOUIS DELACRUZ, JR.,)	AND PROPOSED ORDER
)	
Defendant.)	
)	
)	

The parties hereby jointly request that this case be reset for status hearing on February 10, 2017. This case was previously set for status on January 20, 2017. The parties then received notice of a change to the Court schedule postponing the hearing until January 23, 2017. The parties hereby jointly request that the matter be vacated and reset for status on February 10, 2017.

The government has produced discovery and the defense is continuing to review the discovery. The parties are engaged in discussions to determine whether they can reach a resolution short of trial. The parties will be in a better position to know where this case is headed given a few additional weeks prior to the initial status appearance in this case before the District Court.

1 For these reasons, the parties request that the Court vacate the current status hearing and reset
2 this matter on the Court's criminal calendar on February 10, 2017, at 9:30 a.m., for status.

3 Furthermore, the parties stipulate and agree that time should be excluded from the date of this
4 filing, January 17, 2017, through February 10, 2017, in accordance with the Speedy Trial Act, 18 U.S.C.
5 § 3161(h)(1)(A), for effective preparation of defense counsel while counsel continues to review
6 discovery and investigate the facts and law as it pertains to this case and defendant.

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8 DATED: January 17, 2017

Respectfully submitted,

9 BRIAN J. STRETCH
United States Attorney

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11 /s/ Brigid Martin
BRIGID S. MARTIN
12 Assistant United States Attorney

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14 /s/ Angela Hansen
ANGELA M. HANSEN
15 Counsel for Mr. Delacruz

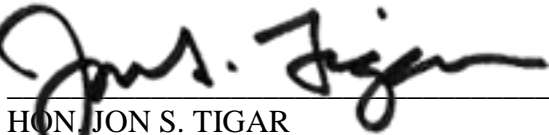
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18 **~~[PROPOSED]~~ ORDER**

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20 Based on the representation of the parties and joint request to reset the initial status conference in
21 this matter, IT IS HEREBY ORDERED that the matter is RESET for status conference on February 10,
22 2017, at 9:30 a.m.

23 Given the agreement between the parties that an exclusion of time is appropriate as set forth in
24 the parties' Stipulated Request, the Court finds that failing to exclude the time between January 17,
25 2017, and February 10, 2017, the date of the next status conference, is appropriate for effective
26 preparation of defense counsel.

1 Accordingly, IT IS HEREBY ORDERED that the time between January 17, 2017, and February
2 10, 2017, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(1)(A).
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4 IT IS SO ORDERED.

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6 _____
7 HON. JON S. TIGAR
8 United States District Judge
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10 DATED: January 18, 2017
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